

Sara Pfrommer
Attorney at Law
505 S. Main Street, Ste. 201
Bountiful, UT 84010
435-602-3453
spfrommer1@gmail.com
Local Counsel for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

Carebourn Capital, L.P.,
and More Capital, LLC,

Plaintiffs;

v.

Standard Registrar and Transfer Co., Inc.,
Darkpulse, Inc., Amy Merrill, Dennis O’Leary,
Thomas Seifert, Carl Eckel, Anthony Brown, and
Faisal Farooqui.

Defendants.

**MOTION FOR LEAVE TO
WITHDRAW AS LOCAL
COUNSEL FOR PLAINTIFFS**

Case No.: 2:22-cv-00346-DBB

Sara Pfrommer, local counsel for Plaintiffs, hereby makes this motion on her own behalf for leave to withdraw as local counsel for Plaintiffs, pursuant to Local Rule DU Civ.R. 83-1.4. The reason for the withdrawal is that Ms. Pfrommer will not be physically present in Utah after May of 2023 and is in the process of winding down her Utah practice. Accordingly, she is no longer able to act as local counsel in this matter. There are no currently pending motions, inasmuch as this matter is currently stayed, although that status is likely to change soon and the issue of withdrawal should be addressed while nothing is currently pending. A copy of the proposed order authorizing the withdrawal is attached hereto as Exhibit “A.”

Minnesota counsel has been appearing *pro hac vice* in this case, and has been informed that Ms. Pfrommer would be filing this withdrawal motion. Minnesota counsel can be reached at: Lee Hutton, The Hutton Firm, 333 South 7th Street, Suite 2150, Minneapolis, MN 55402, (612) 808-9444, email: leehutton@thehuttonfirm.com.

Dated: April 26, 2023

Respectfully submitted,

/s/ Sara Pfrommer

Sara Pfrommer

EXHIBIT “A”
Proposed order on Authorizing Withdrawal of Counsel

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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

Carebourn Capital, L.P.,
and More Capital, LLC,

Plaintiffs;

ORDER AUTHORIZING
WITHDRAWAL OF SARA
PFROMMER AS LOCAL
COUNSEL FOR DEFENDANTS

v.

Standard Registrar and Transfer Co., Inc.,
Darkpulse, Inc., Amy Merrill, Dennis O’Leary,
Thomas Seifert, Carl Eckel, Anthony Brown, and
Faisal Farooqui.

Defendants.

Case No.: 2:22-cv-00346-DBB

Before the Court is the Motion of Sara Pfrommer pursuant to Local Rule DU Civ.R. 83-1.4 for leave to withdraw as local counsel for Carebourn Capital, L.P. (“Carebourn”) and More Capital, LLC (“More”)(collectively, the “Plaintiffs”).

For the reasons set forth in the Motion, Ms. Pfrommer’s request to withdraw as local counsel for Plaintiffs is hereby granted.

Dated: April , 2023

Honorable David B. Barlow
United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that the above Motion for Leave to Withdraw as Local Counsel was served on April 26, 2023 on all parties appearing in the case via electronic filing on the PACER system.

Sara Pfrommer